

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

RICHARD JORDAN and RICKY CHASE,

Plaintiffs,

THOMAS EDWIN LODEN, Jr.,

ROGER THORSON, and

ROBERT SIMON,

Intervenors

v.

PELICIA HALL,

**Mississippi Department of Corrections, in
her Official Capacity, et al.**

Defendants.

Civil Action No. 3:15-cv-00295

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that Plaintiffs Richard Jordan and Ricky Chase, by and through their counsel of record, and pursuant to FED.R.CIV.P. 30, will take the deposition of the member of the Attorney General’s Office designated as “AG1,” and the employees of the Mississippi Department of Corrections designated as “MDOC1” and “MDOC2” in the Defendants’ Responses to Interrogatories on **Wednesday, August 30, 2017**, at the offices of the Mississippi Department of Corrections, 633 North State Street, Jackson, MS 39202, or another location mutually agreeable to the parties. These individuals are employees, agents or attorneys of the Defendants and are required to attend without subpoena. Alternatively, because Defendants have not disclosed the names of these deponents in discovery, Plaintiffs are unable to issue subpoenas to the deponents. Thus, Defendants are responsible for these deponents’ attendance at the depositions.

The deposition will be recorded by court reporter but not videotaped. The deposition will proceed from day-to-day until finished.

The depositions will be scheduled as follows:

1. Deposition of “AG 1”: August 30, 2017 at 11 am.
2. Deposition of MDOC 3:: August 30, 2017 at 1 pm, or immediately after the deposition of AG 1;
3. Deposition of MDOC 2: August 30, 2017 at 3 pm, or immediately after the deposition of MDOC3.
4. Deposition of MDOC 1: August 30, 2017 at 4 pm, or immediately after the deposition of MDOC 2.

Recognizing that “AG 1” may be one of the attorneys for the Defendants in this action, undersigned counsel submits that in answering interrogatories submitted by Plaintiffs, Defendants identified “a member of the Attorney General’s Office (“AG 1”)” who, acting on behalf of MDOC, took actions to attempt to secure lethal injection drugs, including pentobarbital and midazolam, for use in lethal injection executions. The deponent will only be asked questions related to those activities. You are invited to attend and participate as you deem proper.

Respectfully submitted,

/s/ James W. Craig

James W. Craig, MSB # 7798

Emily M. Washington (pro hac vice)

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served this Notice of Deposition by filing same in this Court's Electronic Filing System, which provides notice to counsel for all parties in this case.

This the 22nd day of August, 2017.

/s/James W. Craig